

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

KIEL HOWLAND,

Plaintiff,

vs.

CASE NO: 1:17-cv-00903

HON.: JANET T. NEFF

**NICHOLAS DARLINGTON a/k/a JACKSON NICHOLS,
HEATHER LASS f/k/a HEATHER JOHNSTON a/k/a ANDREA COMLIN,
in their individual and official capacities,
and DAVID GILBERT, in his individual and official capacity.**

Defendants

CHRISTOPHER TRAINOR & ASSOCIATES CHRISTOPHER J. TRAINOR (P42449) AMY J. DEROUIN (P70514) Attorneys for Plaintiff 9750 Highland Road White Lake, MI 48386 (248) 886-8650 (248) 698-3321-fax amy.derouin@cjtrainor.com	DANA M. WOOD (P71955) Attorney for Defendants Darlington and Lass PO Box 30736 Lansing, MI 48909 517-373-6434 Woodd9@michigan.gov
JOHNSON ROSATI SCHULTZ & JOPPICH, S. RANDALL FIELD (P31841) Attorney for Defendant Gilbert 822 Centennial Way, Ste. 270 Lansing, MI 48917 517-886-3800 517-886-9154-fax rfield@jrsjlaw.com	

**PLAINTIFF'S RESPONSE TO DEFENDANT DAVID GILBERT'S AFFIRMATIVE
AND OTHER DEFENSES AND PROOF OF SERVICE**

NOW COMES Plaintiff, **KIEL HOWLAND**, by and through his attorneys, TRAINOR & ASSOCIATES, and hereby denies each and every one of Defendant's Affirmative and Other Defenses either previously or hereinafter filed, and specifically leaves each Defendant to their proofs of every affirmative defense.

Respectfully Submitted,
CHRISTOPHER TRAINOR & ASSOCIATES

/s/Amy J. DeRouin
CHRISTOPHER J. TRAINOR (P42449)
AMY J. DEROUIN (P70514)
Attorney for Plaintiff
9750 Highland Road
White Lake, MI 48386
(248) 886-8650
amy.derouin@cjtrainor.com

Dated: December 13, 2017
AJD/sls

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2017, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following: all attorneys of record and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: None.

s/ Amy J. DeRouin (P70514)
9750 Highland Road
White Lake, MI 48386
Phone: (248) 886-8650
amy.derouin@cjtrainor.com